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January 30, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: CC Docket 96-159

Dear Mr. Caton:

Enclosed for filing on behalf of The Western Reserve Telephone Company, enclosed please find an original and four (4) copies of the Comments in connection with the above-referenced matter.

Please contact the undersigned counsel should you have any questions.

Sincerely,

Carolyn Hill

Carolyn C. Hill

CCH/ss

Enclosures

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

JAN 30 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

**In the Matter of)
Petition of Ameritech for Modification of)
Certain LATA Boundaries in Ohio)**

CC Docket 96-159

**COMMENTS OF THE
WESTERN RESERVE TELEPHONE COMPANY
IN SUPPORT OF CERTAIN ASPECTS OF
PETITION OF AMERITECH FOR MODIFICATION OF
CERTAIN LATA BOUNDARIES IN OHIO**

The Western Reserve Telephone Company ("Western Reserve"), in response to the Commission's Public Notice released January 15, 1997, hereby submits its Comments in the above-captioned proceeding. These Comments are in support of that portion of the Petition of Ameritech for Modification of Certain LATA Boundaries in Ohio ("the Petition") as it relates to Section III of the Petition captioned "One-way EAS from the Aurora, Northfield, and Twinsburg (Ohio) Exchanges of Western Reserve Telephone Company to Ameritech Ohio's Akron Exchange." Western Reserve is a local exchange telephone company certificated by the Public Utilities Commission of Ohio ("Ohio PUCO").

Western Reserve's Twinsburg and Northfield Exchanges are located in Summit County, Ohio and its Aurora Exchange is located primarily in Portage County, but with some portions of the Aurora Exchange located in Summit and Geauga Counties, Ohio (collectively, "Western Reserve Exchanges"). In connection with a proceeding before the Ohio PUCO that included, among other parties, the principal interexchange carriers operating in the area of the Western Reserve Exchanges, a stipulation that included the interexchange carriers, was reached that required Western Reserve to propose one-way EAS from the Western Reserve Exchanges to Ameritech Ohio's Akron exchange. Thereafter, Ameritech and Western Reserve filed a joint petition with the Ohio PUCO for approval of the one-way EAS. The Ohio PUC approved the one-way EAS and ordered its implementation. Copies of the Ohio PUCO's orders were attached to the Petition.

The proposed EAS from the Western Reserve Exchanges to the Ameritech exchange is all one-way into the territory of Ameritech. All of the EAS calls crossing from one LATA to another will be initiated by customers of Western Reserve and terminated in the Ameritech exchange. Western Reserve is not a Bell operating company and has never been subject to prohibitions against providing interLATA service.

In connection with the stipulation and order of the Ohio PUCO with regard to Western Reserve's provision of the one-way EAS, Western Reserve was directed to obtain approval and implement the EAS by April 1, 1997. If Ameritech is unable to obtain an appropriate ruling from the FCC allowing Western Reserve to implement and Ameritech to receive the one-way EAS by such date, Western Reserve's customers will

Ameritech to receive the one-way EAS by such date, Western Reserve's customers will be denied the benefits of the EAS and Western Reserve subjected to monetary penalties. The FCC's approval of Ameritech's petition in advance of April 1, 1997 is, therefore, essential.

In conclusion, Western Reserve supports the Petition of Ameritech with respect to the one-way EAS from the Western Reserve Exchanges and requests that this Commission promptly approve the institution of one-way EAS from the Aurora, Northfield and Twinsburg (Ohio) exchanges of Western Reserve to Ameritech's Akron exchange or, as requested by Ameritech, rule in the alternative, that no further approval is needed for one-way incoming EAS already authorized by a state commission.

Respectfully submitted,
The Western Reserve Telephone Company

By: Carolyn C. Hill
Carolyn C. Hill
Its Attorney

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Dated: January 30, 1997

CERTIFICATE OF SERVICE

I, Sondra Spottswood, certify that a copy of the foregoing Comments of Western Reserve Telephone Company was served on this 30th day of January, 1997, 1997, to the following persons, by U.S. first-class mail, postage prepaid, unless otherwise noted:

By hand delivery

Ms. Cheryl Taylor
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